

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Anchor Glass Container Corporation
603 East North Street
Winchester, Indiana 47394**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T135-6042-00012	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary glass container manufacturing operation.

Responsible Official: Gary Jarrett, General Manager
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394
SIC Code: 3221
County Location: Randolph
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass Furnace, identified as Furnace #1, constructed in 1971, with a maximum design melt capacity of 344 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST7;
- (2) one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass Furnace, identified as Furnace #2, constructed in 1973, with a maximum design melt capacity of 448 tons of glass per day and a maximum qualified pull rate of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8;
- (3) one (1) natural gas, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Brownwell Boiler, constructed in 1908, identified as Boiler #1, rated at 100 hp, with a maximum heat input capacity of 10.5 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST1;
- (4) one (1) natural gas, kerosene, propane, diesel fuel, or numbers 2, 4 or 6 fuel oil-fired Buss Boiler, constructed in 1940, identified as Boiler #2, rated at 250 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST2;
- (5) one (1) natural gas, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Dillon Boiler, constructed in 1948, identified as Boiler #3, rated at 350 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST3;

- (6) one (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouses ST4 and ST9;
- (7) one (1) raw materials batch mixing process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouses ST4 and ST9;
- (8) one (1) glass Furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, controlled by a baghouse E.U2.3 and emissions exhausting to stack ST5; and
- (9) one (1) glass Furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, controlled by baghouse E.U2.4 and emissions exhausting to stack ST6.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) cullet crushing operations;
- (2) one (1) cardboard baler;
- (3) mold swabbing operations, including multiple forming machines;
- (4) hot end treatment operations, including multiple coating hoods;
- (5) four (4) parts washing stations used for maintenance purposes; and
- (6) mold shop operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Condition B.14 entitled "Permit Shield."

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM .

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as state-enforceable only, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, .

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Condition B.13 - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, , any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's rights under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1),(6)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 3, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Condition C.18 (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Condition C.10 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Condition C.10- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Condition C.18 - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Condition B.16 - Deviations from Permit Requirements Conditions must be clearly identified in such reports.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass Furnace, identified as Furnace #1, constructed in 1971, with a maximum design melt capacity of 344 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST7

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the glass Furnace shall not exceed 27.2 pounds per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1]

(a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO₂ emissions from the combustion of fuel oil in the Furnace shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.

(d) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO₂ emissions from the combustion of fuel oil in the Furnace shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

D.1.3 Arsenic [40 CFR Part 61.160, Subpart N]

Pursuant to 40 CFR Parts 61.160, Subpart N (National Emission Standards For Inorganic Arsenic Emissions From Glass Manufacturing Plants) arsenic shall not be used as a raw material in Furnace #1. Therefore, the requirements of this rule shall not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.1.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Furnace, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the Furnace stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions from the combustion of fuel oil in pounds per million Btu of heat input;
 - (3) The calendar month average heat content of the fuel oil used;
 - (4) The calendar month average sulfur content of the fuel oil used;
 - (5) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
 - (6) Fuel supplier certifications, which shall contain, as a minimum, the following:
 - (i) The name of the fuel supplier; and
 - (ii) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the Furnace stack exhaust.
- (c) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 in any compliance period when fuel oil was combusted shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass Furnace, identified as Furnace #2, constructed in 1973, with a maximum design melt capacity of 448 tons of glass per day and a maximum qualified melt capacity of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM), Sulfur Dioxide (SO₂), and Nitrogen Oxides (NO_x) [326 IAC 2-2]

- (a) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the particulate matter emissions from the regenerative Furnace Number 2 shall not exceed 19.06 pounds per hour. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the sulfur dioxide (SO₂) emissions from the regenerative Furnace Number 2 shall not exceed 83.6 pounds per hour.
- (c) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the nitrogen oxide (NO_x) emissions from the regenerative Furnace Number 2 shall not exceed 116.6 pounds per hour.
- (d) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the pull rate of the Furnace Number 2 shall not exceed 390 tons per day.

These limits are necessary in order to render the requirements of PSD not applicable.

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO₂ emissions from the Furnace shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO₂ emissions from the Furnace shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

D.2.3 Arsenic [40 CFR Part 61.160, Subpart N]

Pursuant to 40 CFR Parts 61.160, Subpart N (National Emission Standards For Inorganic Arsenic Emissions From Glass Manufacturing Plants) arsenic shall not be used as a raw material in Furnace #2. Therefore, the requirements of this rule shall not apply.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM, SO₂, and NO_x testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.2.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.2.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Furnace, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Visible Emissions Notations

- (a) Daily visible emission notations of the Furnace stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions from the combustion of fuel oil in pounds per million Btu of heat input;
 - (3) The calendar month average heat content of the fuel oil used;
 - (4) The calendar month average sulfur content of the fuel oil used;
 - (5) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
 - (6) Fuel supplier certifications, which shall contain, as a minimum, the following:
 - (i) The name of the fuel supplier; and
 - (ii) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of daily visible emission notations of the Furnace stack exhaust.
- (c) To document compliance with Condition D.2.1(d), the Permittee shall maintain records of the pull rate of Furnace #2 each day of operation.
- (d) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 in any compliance period when fuel oil was combusted shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Brownwell Boiler, constructed in 1908, identified as Boiler #1, rated at 100 hp, with a maximum heat input capacity of 10.5 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST1

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO₂ emissions from the Boiler #1 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO₂ emissions from the Boiler #1 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

D.3.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 10.5 MMBtu per hour heat input Boiler shall be limited to 0.8 pound per million Btu of heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

- N = Number of stacks in fuel burning operation.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
- h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the SO₂ and PM limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.3.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by:
- (1) Providing vendor analysis of fuel oil delivered, if accompanied by a certification;
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
- (A) Oil samples may be collected from the fuel oil tank immediately after the fuel oil tank is filled and before any oil is combusted; and
- (B) If a partially empty fuel oil tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

- (a) When combusting fuel oil, daily visible emission notations of the Boiler stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions in pounds per million Btu of heat input;
 - (3) The calendar month average heat content of the fuel oil used;
 - (4) The calendar month average sulfur content of the fuel oil used;
 - (5) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel oil combusted during the period; and
 - (6) Fuel oil supplier certifications, which shall contain, as a minimum, the following:
 - (i) The name of the fuel oil supplier; and
 - (ii) A statement from the fuel oil supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the Boiler stack exhaust.
- (c) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 in any compliance period when fuel oil was combusted and the natural gas Boiler certification, shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Buss Boiler, constructed in 1940, identified as Boiler #2, rated at 250 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST2

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO₂ emissions from the Boiler #2 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO₂ emissions from the Boiler #2 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

D.4.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 16.8 MMBtu per hour heat input Boiler shall be limited to 0.8 pound per million Btu of heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain.

This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

- Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
- Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.
- N = Number of stacks in fuel burning operation.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
- h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the SO₂ and PM limits specified in Conditions D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.4.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by:
- (1) Providing vendor analysis of fuel oil delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel oil tank immediately after the fuel oil tank is filled and before any oil is combusted; and

- (B) If a partially empty fuel oil tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Visible Emissions Notations

- (a) When combusting fuel oil, daily visible emission notations of the Boiler stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions in pounds per million Btu of heat input;
 - (3) The calendar month average heat content of the fuel oil used;
 - (4) The calendar month average sulfur content of the fuel oil used;
 - (5) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel combusted during the period; and

- (6) Fuel supplier certifications, which shall contain, as a minimum, the following:
 - (i) The name of the fuel oil supplier; and
 - (ii) A statement from the fuel oil supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records of daily visible emission notations of the Boiler stack exhaust.
- (c) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 in any compliance period when fuel oil was combusted and the natural gas Boiler certification, shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Dillon Boiler, constructed in 1948, identified as Boiler #3, rated at 350 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST3

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO₂ emissions from the Boiler #3 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO₂ emissions from the Boiler #3 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

D.5.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 16.8 MMBtu per hour heat input Boiler shall be limited to 0.8 pound per million Btu of heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.5.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the SO₂ and PM limits specified in Conditions D.5.1 and D.5.2 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.5.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by:

- (1) Providing vendor analysis of fuel oil delivered, if accompanied by a certification;
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel oil tank immediately after the fuel oil tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel oil tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.6 Visible Emissions Notations

- (a) When combusting fuel oil, daily visible emission notations of the Boiler stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.7 Record Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions in pounds per million Btu of heat input;

- (3) The calendar month average heat content of the fuel oil used;
- (4) The calendar month average sulfur content of the fuel oil used;
- (5) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel combusted during the period; and
- (6) Fuel oil supplier certifications, which shall contain, as a minimum, the following:
 - (i) The name of the fuel oil supplier; and
 - (ii) A statement from the fuel oil supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.5.6, the Permittee shall maintain records of daily visible emission notations of the Boiler stack exhaust.
- (c) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

D.5.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 in any compliance period when fuel oil was combusted and the natural gas Boiler certification, shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouses ST4 and ST9

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the raw materials batch storage and conveying process shall not exceed 44.6 pounds per hour when operating at the maximum capacity of 50 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55 (P^{0.11}) - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.6.4 Baghouse [326 IAC 2-7-6(1)]

The baghouses ST4 and ST9 shall be in operation at all times in order to comply with the limit in condition D.6.1.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses ST4 and ST9 stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.6.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch storage and conveying process when venting to the atmosphere. All defective bags shall be replaced.

D.6.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.6.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST4 and ST9 used in conjunction with the raw materials batch storage and conveying process, at least once daily when the raw materials batch storage and conveying process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.15 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.6.5 and D.6.8, the Permittee shall maintain records of daily visible emission notations of the raw materials batch storage and conveying process stack exhaust and of the total static pressure drop across the baghouses ST4 and ST9.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain records of the results of the inspections required under Condition D.6.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) raw materials batch mixing process, with a maximum capacity of 1200 tons per day, constructed in 1929, with emissions controlled by baghouses ST4 and ST9

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the raw materials batch mixing process shall not exceed 44.6 pounds per hour when operating at the maximum capacity of 50 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55 (P^{0.11}) - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.7.4 Baghouse [326 IAC 2-7-6(1)]

The baghouses ST4 and ST9 shall be in operation at all times in order to comply with the limit in condition D.7.1.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses ST4 and ST9 stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.7.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch mixing process when venting to the atmosphere. All defective bags shall be replaced.

D.7.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.7.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST4 and ST9 used in conjunction with the raw materials batch mixing process, at least once daily when the raw materials batch mixing process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.10 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.7.5 and D.7.8, the Permittee shall maintain records of daily visible emission notations of the raw materials batch mixing process stack exhaust and of the pressure drop across the baghouses ST4 and ST9.
- (b) To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6 and the dates the vents are redirected.

- (c) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) glass Furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, with emissions controlled by baghouse ST5;
one (1) glass Furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, with emissions controlled by baghouse ST6

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from each of the glass Furnace day bins shall not exceed 33.4 pounds per hour when operating at the maximum capacity of 22.9 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limits specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.8.4 Baghouse [326 IAC 2-7-6(1)]

The baghouses ST5 and ST6 shall be in operation at all times in order to comply with the limit in condition D.8.1.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.8.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses ST5 and ST6 stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.8.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the glass Furnace day bins when venting to the atmosphere. All defective bags shall be replaced.

D.8.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.8.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST5 and ST6 used in conjunction with the glass Furnace day bins at least once daily when the glass Furnace day bins are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST5 and ST6 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.15 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.8.5 and D.8.8, the Permittee shall maintain records of daily visible emission notations of the glass Furnace day bins stack exhaust and of the pressure drop across the baghouses ST5 and ST6.

- (b) To document compliance with Condition D.8.6, the Permittee shall maintain records of the results of the inspections required under Condition D.8.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] cullet crushing operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the cullet crushing process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.9.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.9.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.9.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.9.1 will be determined based on opacity from the cullet crushing process.

SECTION D.10 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) cardboard baler
--

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the cardboard baling process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.10.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.10.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.10.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.10.1 will be determined based on opacity from the cardboard baling process.

SECTION D.11

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) mold swabbing operation, including multiple forming machines

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.11.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the mold swabbing process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.11.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.11.1 will be determined based on opacity from the mold swabbing operation which exhausts to the Robertson ventilator.

SECTION D.12

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) hot end treatment operations, including multiple coating hoods

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.12.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the hot end treatment process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.12.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.12.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.12.1 will be determined based on opacity from the hot end treatment operations which exhausts to the Robertson ventilator.

SECTION D.13

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] four (4) parts washers used for maintenance purposes

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.13.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.13.2 Hazardous Air Pollutants (HAPs)

Pursuant to the 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning, Subpart T, the solvent used in the parts washers shall not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform.

SECTION D.14 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Mold shop operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.14.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the mold shop operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.14.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.14.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

D.14.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.14.1 will be determined based on opacity from the mold shop operations.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED Boiler CERTIFICATION**

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012
Facility: Furnace #1
Parameter: Sulfur content and heat content of fuel oil used, amount of fuel oil used, and SO₂ emissions
Limits: SO₂ emissions of 0.5 lb/MMBTU of heat input when combusting #2 or #4 fuel oil and 1.6 lb/MMBTU of heat input when combusting #6 fuel oil

Month: _____ Year: _____

Month	Type of Fuel Used (#2, #4, or #6)	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO ₂ Emissions (lb/MMBTU)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012
Facility: Furnace #2
Parameter: Sulfur content and heat content of fuel oil used, amount of fuel oil used, and SO₂ emissions
Limits: SO₂ emissions of 0.5 lb/MMBTU of heat input when combusting #2 or #4 fuel oil and 1.6 lb/MMBTU of heat input when combusting #6 fuel oil

Month: _____ Year: _____

Month	Type of Fuel Used (#2, #4, or #6)	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO ₂ Emissions (lb/MMBTU)

9 No deviation occurred in this month.

9Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012
Facility: Boiler #1
Parameter: Sulfur content and heat content of fuel oil used, amount of fuel oil used, and SO₂ emissions
Limits: SO₂ emissions of 0.5 lb/MMBTU of heat input when combusting #2 or #4 fuel oil and 1.6 lb/MMBTU of heat input when combusting #6 fuel oil

Month: _____ Year: _____

Month	Type of Fuel Used (#2, #4, or #6)	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO ₂ Emissions (lb/MMBTU)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012
Facility: Boiler #2
Parameter: Sulfur content and heat content of fuel oil used, amount of fuel oil used, and SO₂ emissions
Limits: SO₂ emissions of 0.5 lb/MMBTU of heat input when combusting #2 or #4 fuel oil and 1.6 lb/MMBTU of heat input when combusting #6 fuel oil

Month: _____ Year: _____

Month	Type of Fuel Used (#2, #4, or #6)	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO ₂ Emissions (lb/MMBTU)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012
Facility: Boiler #3
Parameter: Sulfur content and heat content of fuel oil used, amount of fuel oil used, and SO₂ emissions
Limits: SO₂ emissions of 0.5 lb/MMBTU of heat input when combusting #2 or #4 fuel oil and 1.6 lb/MMBTU of heat input when combusting #6 fuel oil

Month: _____ Year: _____

Month	Type of Fuel Used (#2, #4, or #6)	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO ₂ Emissions (lb/MMBTU)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012
Facility: Furnace #2
Parameter: daily pull rate
Limits: 390 tons per day

Month: _____ Year: _____

Day	Pull Rate (tons)	Day	Pull Rate (tons)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Anchor Glass Container Corporation
Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406
Part 70 Permit No.: T 135-6042-00012

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Anchor Glass Container Corporation
Source Location: 603 East North Street, Winchester, Indiana 47394
County: Randolph
SIC Code: 3221
Operation Permit No.: T135-6042-00012
Permit Reviewer: Nisha Sizemore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Anchor Glass Container Corporation relating to the operation of a glass container manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) one (1) natural gas or numbers 2, 4, or 6 fuel oil-fired glass furnace, identified as Furnace #1, constructed in 1971, with a maximum melt capacity of 344 tons per day, with emissions uncontrolled and exhausting to stack ST7;
- (2) one (1) natural gas or numbers 2, 4, or 6 fuel oil-fired glass furnace, identified as Furnace #2, constructed in 1973, with a maximum design melt capacity of 448 tons per day and a maximum qualified melt capacity of 390 tons per day, with emissions uncontrolled and exhausting to stack ST8;
- (3) one (1) natural gas or numbers 2, 4, or 6 fuel oil-fired Brownwell Boiler, constructed in 1908, identified as Boiler #1, rated at 100 hp, with a maximum heat input capacity of 10.5 million British thermal units per hour, with emissions uncontrolled and exhausting to stack ST1;
- (4) one (1) natural gas or numbers 2, 4, or 6 fuel oil-fired Buss Boiler, constructed in 1940, identified as Boiler #2, rated at 250 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack ST2;
- (5) one (1) natural gas or numbers 2, 4, or 6 fuel oil-fired Dillon Boiler, constructed in 1948, identified as Boiler #3, rated at 350 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with emissions uncontrolled and exhausting to stack ST3;
- (6) one (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouses ST4 and ST9;
- (7) one (1) raw materials batch mixing process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouses ST4 and ST9;

- (8) one (1) glass furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, with emissions controlled by baghouse ST5; and
- (9) one (1) glass furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, with emissions controlled by baghouse ST6.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) one (1) cullet crushing operation, including a cullet hammer mill, referred to as crusher #1, and a cullet jaw crusher, referred to as crusher #2;
- (2) one (1) cardboard shredder / baler;
- (3) one (1) mold swabbing operation (forming machines);
- (4) one (1) hot end treatment process;
- (5) one (1) bottle internal treatment operation;
- (6) eleven (11) natural gas-fired annealing lehrs;
- (7) one (1) cold end container coating operation including spray coaters;
- (8) one (1) video jet printing system;
- (9) one (1) parts washing station used for maintenance purposes;
- (10) mold shop operations;
- (11) storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC including:
 - (a) one (1) fuel oil tank with a maximum capacity of 67,000 gallons;
 - (b) three (3) fuel oil tanks, each with a maximum capacity of 29,500 gallons;
 - (c) two (2) fuel oil tanks, each with a maximum capacity of 19,350 gallons;
 - (d) one (1) fuel oil tank with a maximum capacity of 15,275 gallons; and
 - (e) one (1) fuel oil tank with a maximum capacity of 10,175 gallons.
- (12) natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour;

- (13) equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (14) a gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (15) a petroleum fuel, other than gasoline, having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (16) storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (17) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (18) refractory storage not requiring air pollution control equipment;
- (19) filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (20) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (21) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C; the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (22) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (23) closed loop heating and cooling systems;
- (24) activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (25) any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- (26) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;
- (27) forced and induced draft cooling tower system not regulated under a NESHAP;
- (28) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (29) heat exchanger cleaning and repair;
- (30) paved and unpaved roads and parking lots with public access;
- (31) covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983;
- (32) underground conveyors;

- (33) asbestos abatement projects regulated by 326 IAC 14-10;
- (34) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (35) blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower;
- (36) diesel generators not exceeding 1600 horsepower;
- (37) stationary fire pumps;
- (38) grinding and machining operations;
- (39) mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C; and
- (40) a laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) OP 68-04-7-0006, issued on June 4, 1974;
- (2) OP 68-11-87-0108, issued on March 8, 1984;
- (3) OP 68-11-87-0109, issued on March 8, 1984;
- (4) CP 135-1942, issued on March 18, 1991; and
- (5) A 135-5897, issued on May 28, 1996.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 3, 1996.

A notice of completeness letter was mailed to the source on March 12, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	179
PM-10	168
SO ₂	615
VOC	27.3
CO	33.7
NO _x	608

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
HCl	less than 10
Sb	less than 10
As	less than 10
Be	less than 10
Cd	less than 10
Cr	less than 10
Co	less than 10
Pb	less than 10
Mn	less than 10
Hg	less than 10
Ni	less than 10
Se	less than 10
TOTAL	less than 25

The potential emissions (as defined in 326 IAC 1-2-55) of PM, PM10, SO₂, and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	165
PM-10	162
SO ₂	320

VOC	24.0
CO	21.8
NO _x	676
HCl	1.2

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Glass Furnace #1	87.89	82.87	213.45	12.56	12.56	389.24	0.00
Glass Furnace #2	83.48	83.48	363.58	14.24	14.24	509.83	0.00
Batch Handling	1.28	1.28	0.00	0.00	0.00	0.00	0.00
Boiler 1	5.30	5.30	72.7	0.10	1.64	18.2	0.152
Boiler 2	8.50	8.50	116.4	0.20	2.63	29.1	0.244
Boiler 3	8.50	8.50	116.4	0.20	2.63	29.1	0.244
Total Emissions	194.95	189.93	882.53	27.30	33.70	975.47	0.64

County Attainment Status

The source is located in Randolph County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Randolph County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this source.

The Furnaces #1 and #2 are not subject to the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR Part 60.290 Subpart CC) because they were constructed prior to June 15, 1979, the applicability date of this rule.

The Boilers #1, #2, and #3 are not subject to the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR Part 60.40c Subpart Dc) because they were constructed prior to June 9, 1989, the applicability date of this rule.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

The parts washing station is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, because the solvent used does not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform.

The furnaces are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart N, because arsenic compounds are not used as raw materials in the furnaces.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on June 3, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year. This source has never been reviewed under the requirements of PSD.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, PM₁₀, SO₂, and NO_x. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Furnace #1

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the glass Furnace #1 shall not exceed 24.4 pounds per hour. (See Appendix A for detailed calculations). Based on the calculations made, the Furnace is in compliance with the limit.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The Furnace #1 is subject to this rule because when combusting fuel oil, the potential to emit SO₂ is greater than 25 tons per year and 10 pounds per hour. Pursuant to this rule, the following conditions shall apply:

- (1) When combusting numbers 2 or 4 fuel oil, the SO₂ emissions from the Furnace #1 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (2) When combusting number 6 fuel oil, the SO₂ emissions from the Furnace #1 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting)

Pursuant to this rule, a quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

Furnace #1 is not subject to the requirements of 326 IAC 8-1-6 (BACT) because the potential emissions from Furnace #1 are less than 25 tons per year.

State Rule Applicability - Furnace #2

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and A 135-5897, issued on May 28, 1996

Pursuant to 326 IAC 2-2 and A 135-5897, the following conditions shall apply:

- (a) The particulate matter emissions from the regenerative Furnace Number 2 shall not exceed 19.06 pounds per hour. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the sulfur dioxide (SO₂) emissions from the regenerative Furnace Number 2 shall not exceed 83.01 pounds per hour.
- (c) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the nitrogen oxide (NOx) emissions from the regenerative Furnace Number 2 shall not exceed 116.4 pounds per hour.
- (d) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the pull rate of the Furnace Number 2 shall not exceed 390 tons per day.

These limitations will render 326 IAC 2-2 (PSD) not applicable.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The Furnace #2 is subject to this rule because when combusting fuel oil, the potential to emit SO₂ is greater than 25 tons per year and 10 pounds per hour. Pursuant to this rule, the following conditions shall apply:

- (a) When combusting numbers 2 or 4 fuel oil, the SO₂ emissions from the Furnace #2 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.

- (b) When combusting number 6 fuel oil, the SO₂ emissions from the Furnace #2 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting)

Pursuant to this rule, a quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

Furnace #2 is not subject to the requirements of 326 IAC 8-1-6 (BACT) because the potential emissions from Furnace #2 are less than 25 tons per year.

State Rule Applicability - Boiler #1

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The Boiler #1 is subject to this rule because when combusting fuel oil, the potential to emit SO₂ is greater than 25 tons per year and 10 pounds per hour. Pursuant to this rule, the following conditions shall apply:

- (a) When combusting number 2 fuel oil, the SO₂ emissions from Boiler #1 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the fuel shall not exceed 0.5 weight percent.
- (b) When combusting number 6 fuel oil, the SO₂ emissions from the Boiler #1 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting)

Pursuant to this rule, a quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to this rule, the PM emissions from the Boiler #1 shall not exceed 0.8 pound per million Btu of heat input. This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

- N = Number of stacks in fuel burning operation.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
- h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

State Rule Applicability - Boiler #2

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The Boiler #2 is subject to this rule because when combusting fuel oil, the potential to emit SO₂ is greater than 25 tons per year and 10 pounds per hour. Pursuant to this rule, the following conditions shall apply:

- (a) When combusting number 2 fuel oil, the SO₂ emissions from Boiler #2 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the fuel shall not exceed 0.5 weight percent.
- (b) When combusting number 6 fuel oil, the SO₂ emissions from the Boiler #2 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting)

Pursuant to this rule, a quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to this rule, the PM emissions from the Boiler #2 shall not exceed 0.8 pound per million Btu of heat input. This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

- N = Number of stacks in fuel burning operation.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
- h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

State Rule Applicability - Boiler #3

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The Boiler #3 is subject to this rule because when combusting fuel oil, the potential to emit SO₂ is greater than 25 tons per year and 10 pounds per hour. Pursuant to this rule, the following conditions shall apply:

- (a) When combusting number 2 fuel oil, the SO₂ emissions from Boiler #3 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the fuel shall not exceed 0.5 weight percent.
- (b) When combusting number 6 fuel oil, the SO₂ emissions from the Boiler #3 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting)

Pursuant to this rule, a quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to this rule, the PM emissions from the Boiler #3 shall not exceed 0.8 pound per million Btu of heat input. This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

- N = Number of stacks in fuel burning operation.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
- h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

State Rule Applicability - Raw Materials Batch Storage and Conveying Process

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the raw materials batch storage and conveying process shall not exceed 44.6 pounds per hour. The baghouses ST4 and ST9 shall operate at all times in order to comply with this limit.

State Rule Applicability - Raw Materials Batch Mixing Process

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the raw materials batch mixing process shall not exceed 44.6 pounds per hour. The baghouses ST4 and ST9 shall operate at all times in order to comply with this limit.

State Rule Applicability - Glass Furnace Day Bins #1 and #2

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from each of the glass furnace day bins shall not exceed 33.4 pounds per hour. The baghouses ST5 and ST6 shall operate at all times in order to comply with this limit.

State Rule Applicability - Cullet Crushing Operation

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the cullet crushing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

State Rule Applicability - Cardboard Shredder / Baler

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the cardboard shredding / baling process shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability - Mold Swabbing Operations

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the mold swabbing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability - Hot End Treatment Process

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the hot end treatment process shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability - Four (4) Parts Washers

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facilities shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operation requirements;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

State Rule Applicability - Mold Shop Operations

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the mold shop operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Compliance Monitoring - Furnace #1

The Furnace #1 has applicable compliance monitoring conditions as specified below:

- (a) A quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.
- (b) Daily visible emissions notations of the Furnace #1 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (c) The Permittee shall maintain records of the daily visible emission notations of the Furnace #1 stack exhaust.
- (d) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform SO₂ testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

These monitoring conditions are required pursuant to 326 IAC 7-2 and to ensure compliance with 326 IAC 7-1.1 and 326 IAC 6-3-2.

Compliance Monitoring - Furnace #2

The Furnace #2 has applicable compliance monitoring conditions as specified below:

- (a) A quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.
- (b) Daily visible emissions notations of the Furnace #2 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (c) The Permittee shall maintain records of the daily visible emission notations of the Furnace #2 stack exhaust.
- (d) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM, SO₂, and NO_x testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.
- (e) The Permittee shall maintain records of the pull rate of Furnace #2 each day of operation. A quarterly report of this information shall be submitted to the OAM using the form located at the end of the permit.

These monitoring conditions are required pursuant to 326 IAC 7-2 and to ensure compliance with 326 IAC 7-1.1 and 326 IAC 2-2 (PSD).

Compliance Monitoring - Boiler #1

The Boiler #1 has applicable compliance monitoring conditions as specified below:

- (a) A quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

- (b) When combusting fuel oil, daily visible emissions notations of the Boiler #1 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (c) The Permittee shall maintain records of the daily visible emission notations of the Boiler #1 stack exhaust.

These monitoring conditions are required pursuant to 326 IAC 7-2 or are required in order to ensure compliance with 326 IAC 6-2.

Compliance Monitoring - Boiler #2

The Boiler #2 has applicable compliance monitoring conditions as specified below:

- (a) A quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.
- (b) When combusting fuel oil, daily visible emissions notations of the Boiler #2 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (c) The Permittee shall maintain records of the daily visible emission notations of the Boiler #2 stack exhaust.

These monitoring conditions are required pursuant to 326 IAC 7-2 or are required in order to ensure compliance with 326 IAC 6-2.

Compliance Monitoring - Boiler #3

The Boiler #3 has applicable compliance monitoring conditions as specified below:

- (a) A quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

- (b) When combusting fuel oil, daily visible emissions notations of the Boiler #3 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (c) The Permittee shall maintain records of the daily visible emission notations of the Boiler #3 stack exhaust.

These monitoring conditions are required pursuant to 326 IAC 7-2 or are required in order to ensure compliance with 326 IAC 6-2.

Compliance Monitoring - Raw Materials Batch Storage and Conveying Process

The raw materials batch storage and conveying process has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the baghouses ST4 and ST9 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall maintain records of the daily visible emission notations of the baghouses ST4 and ST9 stack exhausts.
- (c) The Permittee shall record the total static pressure drop across the baghouses ST4 and ST9 used in conjunction with the raw materials batch storage and conveying process, at least once daily when the raw materials batch storage and conveying process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (d) An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch storage and conveying process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (e) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.
- (f) The Permittee shall maintain records of the results of the baghouse inspections.

These monitoring conditions are required in order to ensure compliance with 326 IAC 6-3-2.

Compliance Monitoring - Raw Materials Batch Mixing Process

The raw materials batch mixing process has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the baghouses ST4 and ST9 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall maintain records of the daily visible emission notations of the baghouses ST4 and ST9 stack exhaust.
- (c) The Permittee shall record the total static pressure drop across the baghouses ST4 and ST9 used in conjunction with the raw materials batch mixing process, at least once daily when the raw materials batch mixing process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (d) An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch mixing process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (e) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.
- (f) The Permittee shall maintain records of the results of the baghouse inspections.

These monitoring conditions are required in order to ensure compliance with 326 IAC 6-3-2.

Compliance Monitoring - Glass Furnace Day Bins #1 and #2

The glass furnace day bins #1 and #2 have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the baghouses ST5 and ST6 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall maintain records of the daily visible emission notations of the baghouses ST5 and ST6 stack exhausts.
- (c) The Permittee shall record the total static pressure drop across the baghouses ST5 and ST6 used in conjunction with the glass furnace day bins, at least once daily when the glass furnace day bins are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST5 and ST6 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (d) An inspection shall be performed each calendar quarter of all bags controlling the glass furnace day bins #1 and #2 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (e) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.
- (f) The Permittee shall maintain records of the results of the baghouse inspections.

These monitoring conditions are required in order to ensure compliance with 326 IAC 6-3-2.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this glass container manufacturing operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T135-6042-00012.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Anchor Glass Container Corporation
Source Location: 603 East North Street, Winchester, Indiana 47394
County: Randolph
SIC Code: 3221
Operation Permit No.: T135-6042-00012
Permit Reviewer: Nisha Sizemore

On July 10, 1998, the Office of Air Management (OAM) had a notice published in the News Gazette, Winchester, Indiana, stating that Anchor Glass Container Corporation had applied for a Part 70 Operating Permit to operate a glass manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) ~~The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.~~ **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
 - (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
 - (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]
2. Condition B.28 (Credible Evidence) has been deleted as recommended by the U.S. EPA. U.S. EPA and upon further evaluation of OAM.

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

~~Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.~~

On August 13, 1998, Anchor Glass Container Corporation submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

General Comments

Comment #1

Please indicate the permit issuance date, expiration date, and all modification dates/numbers on the permit cover page. Please place a revision date in the document header on each page of the permit. This will help ensure that future permit modifications are efficiently tracked.

Response #1

Upon final issuance, the permit cover page will state the issuance date. Condition B.3 specifies the expiration date. If any modifications are made to the permit after final issuance, the modification dates and numbers will be placed on the cover page of the modification or amendment.

Comment #2

Please capitalize throughout F for furnace and N for Number where it follows a unit name, such as Furnace Number.

Response #2

The OAM has capitalized as suggested.

Comment #3

Anchor Glass requests that the five emission units associated with the raw materials batch house (two day bins, one cullet crusher, the raw materials storage and conveying process, and the raw materials mixing process) be combined as a single source called "batch house". The batch house is a complex raw materials handling process consisting of several different storage vessels and conveyors. Tracking and documenting compliance would be simplified by combining the five segments as one emission unit in the permit.

Anchor also requests that the boilers be combined into one section within the permit, since the applicable requirements are the same.

Response #3

These emission units each have their own individual requirements. By separating them, it is clear that each individual emission unit must comply with the requirements listed in that particular Section D of the permit. Since the OAM views these units as separate, the permit should list them as separate. There have been no changes to the permit resulting from this comment. Listing the units in separate D Sections of the permit does not result in requiring more record keeping or reporting. The same amount of tracking and documentation would apply no matter whether the units were listed in separate D Sections of the permit, or together in one Section D of the permit.

Comment #4

Anchor Glass requests clarification that a permit modification would not be required to replace the raw materials baghouses, provided the replacements were of similar design and construction to those already in place. This replacement in kind would strictly entail a letter of notification to IDEM. This appears to be allowed under 326 IAC 2-7-12 (Part 70 Permits: Modifications).

Response #4

The OAM would need to review the specific proposed replacement before being able to state what type of modification would be required upon replacement of a control device. The replacement may only require a minor permit modification, or if compliance is somewhat questionable with the new control device, a stack test requirement may need to be added to the permit, in which case, a significant modification would be necessary. If Anchor Glass intends to replace some equipment, it would be necessary to inform the OAM of the exact equipment to be replaced. At that time the OAM would review the changes and complete the appropriate modification at that time.

Comment #5

If new baghouses were to be installed on existing uncontrolled emission points, would these new baghouses require a permit modification? Anchor Glass requests that a letter of notification be considered acceptable for this purpose under 326 IAC 2-7-12 (Part 70 Permits: Modifications).

Response #5

If the new baghouses are used so that the emission unit(s) can comply with the rules and permit conditions or so that the source can report less actual emissions, then a permit modification would be necessary. If a control device is used to comply with rules or permit conditions, then the permit must contain specific compliance monitoring conditions necessary to ensure proper operation of the control device(s). These conditions would need to be added to the permit via a permit modification. Again, the specific proposed changes would need to be reviewed by the OAM prior to making such a decision.

Comment #6

Anchor Glass requests that IDEM consider allowing additional operational flexibility for the two furnaces. Please refer to Bob Metzger's letter to IDEM dated May 19, 1998. This requested language should be included in B.22 on page 19, and under furnace requirements in the specific D Section of the permit. Anchor Glass requests that specific citations listed in the permit include 326 IAC 2-5.1 (New Source Construction); 326 IAC 2-7 (Emission Caps); and 326 IAC 2-7-20 (Operational Flexibility).

Anchor Glass requests that the permit explicitly state that Anchor Glass can make any changes so long as emissions are not increased greater than 5 tons per year or 10 tons per year beyond the bubbled furnaces emissions cap, as appropriate. Such changes could include designing and installing a larger furnace, replacing a unit with a new furnace, or adding one or more new furnaces in addition to the two existing furnaces. Under these scenarios, no permit application would be required, but Anchor Glass would provide advance notification to IDEM. At the appropriate emissions increase level, a minor permit revision would be needed. For the appropriate emissions increases, a major permit revision will be required. When emissions increases are expected to accompany a change, a stack test would be required.

Response #6

The additional flexibility suggested is not permitted under current state and federal permitting rules. As explained in Paul Dubenetzky's letter to Bob Metzger dated May 28, 1998, the permit will not explicitly state that Anchor Glass can make the suggested changes (i.e. designing and installing a larger furnace, replacing a unit with a new furnace, or adding one or more new furnaces in addition to the two existing furnaces) because the changes suggested would require a permit under New Source Review as well as a major modification to the Title V permit. If such changes are to occur at Anchor Glass, a permit application would be required so that the OAM could review the proposed change and issue the proper permit and/or permit modification.

Section A

Comment #7

Please replace Roger Erb with the more general title "General Manager," with no name specified. This individual, not Mr. Erb, will be the responsible official in charge of signing compliance demonstration forms, and the like. The current General Manager is Gary Jarrett.

Response #7

326 IAC 2-7-6(6) gives IDEM the authority to put the names of the responsible officials in the permits if it chooses to do so. Since the source is likely to have one responsible official who generally signs the reports and compliance certifications for the company, IDEM chooses to put that individual in the permit so that IDEM, as well as the public, know who the responsible official will be. This saves time because whenever the person listed in the permit signs as the responsible official, IDEM knows that the person meets the definition of a responsible official; therefore IDEM does not have to verify the credentials of that person each time a document is submitted. The responsible official has been changed from Roger Erb to Gary Jarrett.

If IDEM lists a responsible official in the permit, it does not preclude other persons who meet the definition of "responsible official" from signing and submitting documents that require certification by a responsible official. The reason being that although the permit lists a responsible official, the permits do not contain any provision requiring that only the persons listed as the responsible official in the permit may certify the reports and compliance certifications. Therefore, since the permit does not specify who must sign the certifications, the rules, which require certification by "a" responsible official, govern and the certification may be signed by someone who meets the definition of "responsible official", but is not listed in the permit. If someone who is not listed in the permit signs a document as the responsible official, IDEM has to verify the credentials of that person to make sure that the person meets the definition of a responsible official.

Comment #8

In A.2(1), A.2(2), and in the Facility Description boxes in Sections D.1 and D.2 the word "design" should replace the word "melt" and the capacities should be expressed as tons of glass per day. Please also insert the sentence: "The qualification level can be increased if a stack test shows emissions below the caps."

Response #8

These changes have been made, except for the insertion of the sentence: "The qualification level can be increased if a stack test shows emissions below the caps." In Paul Dubenetzky's May 28, 1998 letter to Bob Metzger, the OAM proposed to Anchor Glass that if a stack test were performed before the issuance of the Title V permit, which showed that higher throughputs would not increase the emissions from the furnace, that the condition could be modified accordingly. Since Anchor Glass chose not to conduct such a stack test prior to the issuance of the permit, the condition cannot be changed as suggested. Anchor Glass can choose to conduct a stack test at any time in the future in order to show that increased throughputs to the furnace would not increase emissions. However, in order to be allowed to operate the furnace at this increased throughput, Anchor Glass would need to obtain a permit amendment.

Comment #9

In A.2(3) and A.2(5) a capacity is not appropriate because this is a storage process.

Response #9

The OAM must list capacities for each emission unit. Emission estimates are based on these capacities and rule applicability is based on the emission estimates. The permit notes the capacities so that it is clear that rule applicability was based on these capacities and corresponding potential emissions.

Comment #10

Please indicate in the descriptions of the boilers that propane, kerosene, and diesel fuel may also be burned.

Response #10

Anchor Glass does not currently have a permit to combust these fuels in these furnaces. Operation permit 68-11-87-0108 issued March 8, 1984 only allows for the combustion of natural gas, and #2, #4, and #6 fuel oil. However, the use of these alternate fuels would not increase the potential emissions of any criteria pollutant; therefore this change in fuel use is not considered a modification subject to New Source Review. Since the change in fuel usage would not increase emissions of any pollutant, it would not subject the boilers to the applicability of the New Source Performance Standard, 40 CFR Part 60.40c, Subpart Dc. The requested change has been made to the permit.

Comment #11

The permit for the Winchester Plant lists a cardboard baler; however, the permit for the Lawrenceburg plant does not list a cardboard baler. To ensure consistency please either add the baler to the permit for the Lawrenceburg plant or delete the baler from the Winchester Plant's permit.

Response #11

The cardboard baler has been added to the permit for the Lawrenceburg Plant.

Comment #12

In A.3.(1) please refer to this unit strictly as cullet crushing operations.

Response #12

The suggested change has been made in Sections A and D.9 of the permit.

Comment #13

The description of the hot end treatment operation should be corrected to "including multiple coating hoods."

Response #13

The suggested change has been made in Sections A and D.12 of the permit.

Comment #14

In A.3 the word "and" should be added to the end of (5). There should be a period after (6).

Response #14

The suggested changes have been made to the permit.

Section B

Comment #15

Any provision that is not federally enforceable should also indicate that it is not federally enforceable by citizen suit.

Response #15

The CAA's provisions regarding citizen's actions should be interpreted as appropriate for a specific case. Conditions B.4 and B.9 have been clarified as follows:

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM .
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and **by** citizens ~~under~~ **in accordance with** the Clean Air Act.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as state-enforceable only**, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.

- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Comment #16

In reference to condition B.9, Anchor Glass does not agree that all permit noncompliances, such as missing one daily visible emissions notation, is a violation of the Clean Air Act warranting enforcement action, permit termination, or the like. Permit conditions related to surrogate monitoring parameters (such as visible emissions notations, pressure drop, and baghouse integrity) should be modified to allow a certain number of missed measurements within a specified time period. An exceedance of this requirement would be a noncompliance under Section B.9.

Response #16

Failure to perform required compliance monitoring constitutes a violation of the permit requirement, which is a violation of the Clean Air Act, and does allow the OAM to pursue enforcement actions. Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Allowing a certain number of missed measurements would allow sporadic use of compliance monitoring, which would not accomplish the purpose of compliance monitoring. Condition C.21 addresses minor cases of missing information.

Comment #17

Anchor Glass requests that Condition B.11 be renamed "Annual Compliance Certification Report." Please also change the title of the certification form from "Certification" to "Annual Compliance Certification Report."

Response #17

The OAM believes that Condition B.11 is titled appropriately based on the requirements contained in the condition.

The certification form is required to be submitted not only with the annual compliance certification, but also with any application form or quarterly report form submitted. Therefore, it would be confusing to label the certification form as "Annual Compliance Certification Report", since it is required to be submitted with forms other than just the annual compliance certification form.

Comment #18

Condition B.12 should clarify that while the requirement to prepare a Preventive Maintenance Plan may be federally enforceable, the contents of the plan would not be federally enforceable, nor enforceable by citizen suit.

Response #18

The OAM believes that the contents of the Preventive Maintenance Plan (PMP) are federally enforceable to the extent that Condition B.12 requires that improper maintenance does not cause or contribute to a violation.

Comment #19

Regarding Condition C.16, since deviations of surrogate compliance monitoring parameters are not considered permit noncompliances, the permit should clarify that these deviations are not the basis for an enforcement action and as such do not constitute potential violations for the purposes of federal enforcement of citizen suits.

Response #19

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan(PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widgets was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be include in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the condition.

Comment #20

The language in Condition B.14 (c) should directly follow the wording of 326 IAC 2-7-15(d). The phrase "including any term or condition from a previously issued construction or operation permit" should be deleted.

Response #20

The condition merely tries to better explain the requirement of the rule. The rule states that "If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, the commissioner shall immediately take steps to reopen and revise the permit and issue a compliance order to the source to ensure expeditious compliance with the applicable requirement until the permit is reissued." The condition in the permit merely attempts to explain that these applicable requirements can include conditions from a previously issued construction or operation permit, as provided by 326 IAC 2-7-1(6).

Comment #21

In Condition B.22 Anchor Glass requests that the full language of 326 IAC 2-7-20 be incorporated as proposed. The current wording of B.22 is somewhat confusing and gives the general appearance of being more restrictive than the regulations allow.

Response #21

Condition B.22 attempts to summarize and clarify the requirements of 326 IAC 2-7-20. No changes have been made as a result of this comment.

Comment #22

Condition B.24(e), which states that OAM can utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements, does not provide the source with reasonable time to make appropriate arrangements to protect confidential information. When there is a likelihood that IDEM OAM may wish to take photographs, make recordings, or remove material, the source should be given reasonable advance notice so that appropriate arrangements for clearance, credentials, copies, the presence of appropriate corporate officials, and confidentiality agreements can be asserted.

Response #22

Condition B.24 has been clarified to address concerns regarding confidentiality, as follows:

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's rights under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
- ~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM,~~

~~makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

The OAM may utilize the photographic, recording, testing, monitoring or other equipment during the course of a compliance inspection in order to determine compliance with applicable requirements. The OAM cannot agree to give advance notice of plant inspections.

Comment #23

The language of condition B.25 (c) should follow 326 IAC 2-7-11(c). The regulations do not provide for the reservation of the right to reopen or reissue a permit in the event of the transfer of ownership of the operation.

Response #23

326 IAC 2-7-11(a)(4) states that an administrative permit amendment can "allow for a change in ownership or operational control of a source where the commissioner determines that no other change in a Part 70 permit is necessary..." The OAM interprets this as meaning that the commissioner has discretion to determine if other changes are necessary, in which case a new permit may be necessary.

Comment #24

The source does not believe that the issue of credible evidence is an appropriate subject for a permit condition. This is a policy interpretation, rather than a permit requirement, and thus should not be included in this permit. The source reserves all rights it may have with respect to any alleged violations, including the admissibility and relevance of evidence which may be introduced regarding any alleged violation.

Response #24

IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

Comment #25

In comparing the permits for the Lawrenceburg plant and the Winchester plant, we noticed that the Lawrenceburg permit contains 22 C Conditions, while Winchester contains 24. The two sections added to Winchester appear to be C.2 (Particulate Matter Emission Limitations) and C.8 (Stack Height). Please clarify for us why these two documents are different, as these requirements appear to be general conditions that should be applicable to both facilities.

Response #25

The C.2 condition was originally part of both permits. Both conditions are applicable to both facilities. The C.8 (Stack Height) condition will be added to the permit for the Lawrenceburg plant.

Comment #26

In reference to condition C.2 which lists an emission limit pursuant to 326 IAC 6-3-2 for processes with process weight rates less than 100 pounds per hour, which specific processes at Anchor Glass are covered under this requirement? Otherwise, why include this as an applicable requirement?

Response #26

All particulate emitting processes which have a process weight rate of less than 100 pounds per hour must comply with this requirement. 326 IAC 2-7-5 requires that the Title V operating permit contains all applicable requirements. This is listed as an applicable requirement in order to clarify that the PM emission limit pursuant to 326 IAC 6-3-2 (Process Operations) cannot be lower than the limit specified for a process with a 100 pounds per hour process weight rate. The OAM cannot specifically list all the facilities at Anchor Glass which must comply with this specific limit because the OAM does not request process weight rates for insignificant activities.

Comment #27

Regarding Condition C.9 what is the regulatory basis for requiring notification for all demolition projects? Regarding Condition C.9(f) if a facility has already completed a facility wide asbestos survey using an Indiana Accredited Asbestos Inspector, then why should an additional survey be required prior to renovation or demolition?

Response #27

40 CFR Part 61.145 requires such an inspection prior to the commencement of the demolition or renovation.

326 IAC 14-10 requires a thorough inspection of the affected facility or part of the facility by an Indiana accredited asbestos inspector. It is unlikely that a source would find it cost-effective to have an entire property thoroughly inspected for asbestos. Only schools with students in any grade from kindergarten through grade 12 are required to have a thorough inspection of the entire property. Thorough inspection includes analysis of any material that may contain asbestos. This could include cement walls, linoleum floor covering and counter tops, ceiling and wall panels, roofing, pipe wrap, and more. In addition, there would be no assurance that no asbestos-containing material has been added since the inspection. Many materials currently on the market are legally allowed to contain asbestos. Finally, asbestos-containing material that was determined at one time to be non-friable may deteriorate with time and become friable. Therefore, these conditions remain unchanged.

Comment #28

In reference to condition C.14, Anchor Glass does not believe that these high performance pressure gauges are available at a reasonable cost. We request that an alternate performance specification be required.

Response #28

For reasons discussed in the response to comment #43, the OAM believes that monitoring the pressure drop across the baghouses is important for determining the proper operation of the baghouses. In order to accurately measure the pressure drop, adequate pressure drop gauges must be used.

Comment #29

This section would be more appropriately titled "Compliance Monitoring Plan - Response Steps."

Response #29

The OAM believes that the condition is appropriately titled. Changing the title of the condition would not change the requirements of the condition.

Comment #30

Sulfur dioxide emissions from the glass melting furnaces result from two separate physical actions; the combustion of fuel oil and the melting of raw materials such as sand and limestone. The emissions from both actions are ducted to a common stack. The SO₂ emission limits in pounds per million Btu of heat input stated in D.1.2 and D.2.2 do not take into account the emissions from the melting process. Therefore, we request that the lb/MMBtu limits for the furnaces be removed from the permit.

Response #30

The lb/MMBtu SO₂ limits stated in D.1.2 and D.2.2 are only applicable to the SO₂ emissions resulting from the combustion of fuel oil. The OAM understands that the SO₂ emissions from the furnace stack are from both the combustion of fuel oil and the process of melting raw materials. The OAM proposed to determine compliance with this limit by requiring fuel oil sampling and analysis and by the record keeping and reporting requirements contained in 326 IAC 7-2. The requirements to stack test the furnace #1 for SO₂ emissions have been deleted. The permit does not require any testing for the boilers, however, OAM reserves the authority to require a test at any time to ensure compliance with the applicable requirements. The requirement to stack test Furnace #2 for SO₂ emissions remains in the permit because condition D.2.1 establishes a limit for the total amount of SO₂ that can be emitted from the furnace in order to render the requirements of PSD not applicable.

Comment #31

In reference to D.1.6, D.2.6, D.3.5, D.4.5, D.5.5 since fuel oil is generally not used in the furnaces or the boilers, one alternative for demonstrating compliance should be to certify that fuel oil was not used during the relevant time period.

Response #31

The OAM agrees. Conditions D.3.8, D.4.8, and D.5.8 for the boilers have been changed to the following (additions are shown as bold):

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 **in any compliance period when fuel oil was combusted, and the natural gas fired boiler certification**, shall be submitted to the address listed in Section C - General Reporting

Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Conditions D.1.9 and D.2.9 now state that the reports shall be submitted for any quarter during which fuel oil was combusted.

Comment #32

Conditions D.1.6 (a) 2.6 (a), D.3.5(a), D.4.5(a), and D.5.5(a) only refers to the 0.5% limit on sulfur content, whereas a limit of 1.4% alternatively may be applicable, depending on the type of fuel oil combusted.

Response #32

The OAM agrees. The appropriate changes have been made to the permit.

Comment #33

In reference to all the requirements to perform visible emissions notations, Anchor Glass requests that the following wording be employed "normal daylight operations, climatic conditions allowing." Our interpretation is that "normal daylight" refers to business hours, but does not account for inclement weather that may preclude visible emissions notations.

Furthermore, we request that this condition be modified to state that the source is allowed to miss up to six visible emission notations per quarter, with no more than two consecutive daily misses. Compliance with this requirement would avoid the issued described under Condition B.9.

Please clarify what level of "training" is acceptable, i.e., by whom (internal vs. external), duration of training, etc. Perhaps the word "trained" could be replaced with "experienced." Since a certified opacity reader will not be required and observations will be merely qualitative, please specify this explicitly, such as "This experienced employee need not be, or be trained by, a certified opacity reader.

Response #33

The source should be able to perform visible emissions notations each day of operation of the facility. Since Method 9 opacity readings are not required, the observer should be able to determine whether the visible emissions are "normal" or "abnormal" regardless of the weather.

The condition will not be revised to state that the source can miss up to six visible emission notations per quarter, with no more than two consecutive daily misses, because this is unacceptable compliance monitoring. Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Condition C.21 addresses minor cases of missing data and information.

As the condition states, a trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. This training does not need to include the training to become a certified opacity reader nor does the training need to be done by a certified opacity reader. The purpose of specifying that a "trained employee" perform the visible emissions notations is to make sure that the employee would know the difference between "normal" and "abnormal" visible emissions from the particular process. The OAM believes that the definition of a "trained employee" is clear in the permit; therefore, no changes have been made to the permit in response to this comment.

Comment #34

In reference to D.1.9 and D.2.9, how shall "equivalent sulfur dioxide emissions in pounds per million Btu" be calculated? What is the purpose of this requirement?

Response #34

The purpose of this requirement is to comply with 326 IAC 7-2, and to show compliance with 326 IAC 7-1 and 326 IAC 7-4. To calculate the SO₂ emissions in pounds per million Btu from one of the furnaces, use the following equation:

$$157S \times \text{fuel oil usage (kgallons/day)} / \text{maximum heat input capacity of the furnace (MMBtu/hr)} \times (24 \text{ hrs/day})$$

where S = sulfur content of the fuel oil

Comment #35

The average heat content and sulfur content of the fuel combusted are data that must be provided to Anchor Glass with the fuel oil specification by the fuel oil supplier. Thus, these requirements should be recorded under D.1.8(a)(6), not as stand-alone statements.

Response #35

The average heat content and sulfur content of the fuel can be provided as part of the fuel supplier certifications. It is not necessary to change the order of the requirements in the permit.

Comment #36

All references to fuel oil should always reference "fuel oil," not simply "fuel."

Response #36

The requested changes have been made.

Comment #37

The permit limits in condition D.2.1 state that they are pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration). These units are not subject to PSD because of the limits in the permit. These references should be deleted.

Response #37

The condition has been changed to state "Pursuant to A135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable..."

Comment #38

In Condition D.2.1, we believe that the limits should be 83.6 pounds per hour for sulfur dioxide and 116.6 pounds per hour for nitrogen oxides, instead of 83.01 pounds per hour and 116.4 pounds per hour.

Response #38

The OAM agrees. The requested changes have been made.

Comment #39

Anchor Glass understands that the limit of 390 tons of glass pulled per day is a qualified limit and only will stand until the source can prove that a larger quantity of glass can be pulled without triggering an increase in emissions. Thus, we request that the wording be revised appropriately, as follows: "The qualified pull rate of Furnace Number 2 shall not exceed 390 tons per day. Anchor Glass may increase this pull rate upon demonstration of compliance with the stated emission limits." Anchor Glass proposes that a letter request be considered appropriate for notifying IDEM of the desire to attempt a higher pull rate.

Response #39

In Paul Dubenetzky's May 28, 1998 letter to Bob Metzger, the OAM proposed to Anchor Glass that if a stack test were performed before the issuance of the Title V permit, which showed that higher throughputs would not increase the emissions from the furnace, that the condition could be modified accordingly. Since Anchor Glass chose not to conduct such a stack test prior to the issuance of the permit, the condition cannot be changed as suggested. Anchor Glass can choose to conduct a stack test at any time in the future in order to show that increased throughputs to the furnace would not increase emissions. However, in order to be allowed to operate the furnace at this increased throughput, Anchor Glass would need to obtain a permit amendment.

Comment #40

It is unclear what is meant by the "natural gas boiler certification" as we have been unable to locate this form in the document. What is the goal of this requirement, as we perceive it to be duplicative with other requirements related to fossil fuel combustion.

Response #40

The natural gas boiler certification was included as page 70 of the draft permit. The natural gas boiler certification form provides information on the days that alternate fuel was burned. This information is not requested on any other form. The natural gas boiler certification also serves as an alternative for compliance monitoring whenever natural gas is combusted.

Comment #41

How is the process weight limit to be applied to the storage process? How may compliance with the process weight limit be demonstrated?

Response #41

The process weight limit would be calculated based on the weight of materials located in the storage area in any given hour. The permit does not require a stack test to show compliance with the condition; however, the OAM could require a stack test at any time necessary to show compliance with the emission limit. The compliance monitoring conditions also help to show compliance with the emission limitation. The visible emission notations help show that the baghouse is operating properly, which in turn shows that it is likely that the PM emissions from the facility are in compliance with the rule.

Comment #42

Conditions D.6.6, D.7.6, and D.8.6 state that "A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter." Please clarify the expression "redirecting the vents." Anchor Glass does not have operations that would necessitate bypassing the existing control equipment and venting directly to the atmosphere.

Response #42

Sometimes facilities have the capability of venting the emissions from their baghouse either inside the plant or outside to the atmosphere. This condition would require a baghouse inspection whenever the facility would switch the baghouse emissions from venting inside the plant to venting outside to the atmosphere. Since Anchor Glass does not have operations that would allow vents to be redirected, this language has been removed from the permit.

Comment #43

The requirements to inspect the baghouses on a quarterly basis and to record differential pressure drops across the baghouses are duplicative with the requirement to perform daily visible emission notations. The baghouses are routinely inspected as part of the facility's preventive maintenance plan. In reality, the measurement of pressure drop is a Response step should visible inspection indicate abnormal conditions. Anchor Glass requests that these conditions and their associated record keeping requirements be deleted from the permit.

Response #43

IDEM agrees that some bag failures are immediately detected through visible emission observations; however, the degree of bag failure may cause slow deterioration of the overall performance of the unit; in which case a baghouse inspection would be necessary to identify the problem.

Monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. The Compliance Response Plan should include Response steps to anticipate corrective actions when abnormal conditions arise. Both gradual and sudden changes in the pressure drop could result in damage to the bags or baghouse if not properly addressed.

The requirements to perform baghouse inspections and to measure the pressure drops across the baghouses will remain unchanged in the permit.

Comment #44

As related to the batch house, Anchor Glass does not believe that the application of the process weight limit is appropriate. The batch house is a materials handling process consisting of controlled and uncontrolled emission points, including storage silos, storage piles, storage bins, conveyors, mixers, and numerous baghouses. As such, while a process weight limit could be calculated based on throughput, how can emissions accurately be estimated and how can compliance truly be demonstrated, since it is impossible to measure these emissions? It appears that application of the fugitive particulate matter emission limitations presented in 326 IAC 6-5 would be more appropriate. This regulation specifically addresses storage of aggregate, including sand, which is the primary ingredient in the facility's glass product. Indeed, the configuration of the raw materials handling processes at a glass plant are quite similar to those found at a quarry, cement plant, or other similar industry. We therefore request the elimination of the process weight limits presented in the permit and replacement with the fugitive particulate emission standard. Also, it is not stated in the permit what process weight rates were used to calculate the emission limitations.

Response #44

326 IAC 6-4 is applicable to sources of fugitive dust and is described in Condition C.6 of the permit. If fugitive dust becomes a problem at the source, the OAM may require Anchor Glass to submit a fugitive dust control plan pursuant to 326 IAC 6-5. However, since fugitive dust has not proven to be a problem at this source in the past, the OAM does not believe it is necessary to enforce such a plan at this particular time.

However, the batch house also does include some nonfugitive sources of emissions which is proven by the use of baghouses to control these emission sources. These nonfugitive emissions can be stack tested if necessary to show compliance with the process weight limit. The process weight rule is applicable to any process that emits particulate matter, unless that process is specifically exempted in the rule or must comply with 326 IAC 6-1 instead. Loading and unloading silos, storing materials, mixing raw materials, and conveying raw materials are all considered processes under the definition of process. Therefore, the OAM believes that the process weight rule is applicable as stated in the permit. The permit does not require a stack test to show compliance with these conditions; however, the OAM could require a stack test at any time necessary to show compliance with the emission limit. The compliance monitoring conditions also help to show compliance with the emission limitation. The visible emission notations help show that the baghouses are operating properly, which in turn shows that it is likely that the PM emissions from the facility are in compliance with the rule. The process weight limits used for calculating the limits are shown in Appendix A of the TSD with the emissions calculations. The permit has been revised to show what process weight rates were used to calculate each limit in Sections D.7 and D.8.

Comment #45

The cullet crusher is a fugitive source of emissions and does not exhaust to the Robertson ventilator, as stated in D.9.3. We request that this unit be incorporated into the combined batch house emission unit, since these operations are interrelated.

Response #45

The reference to the Robertson ventilator has been removed from the permit. Condition D.9.3 was placed in the permit at the request of the source. This unit will remain in Section D.9 and will not be combined in a Section with other units, because the OAM views this unit as a separate emission unit.

Comment #46

The cardboard baler, the mold swabbing operation, the hot end treatment process, and the mold shop operations are fugitive sources of emissions. The cardboard baler does not exhaust to the Robertson ventilator as stated in Condition D.10.3. Because the potential emissions from the cardboard baler are so low, we request that this unit be considered insignificant and removed from the permit. We request that the process weight rule for the mold swabbing operations, the hot end treatment process, and the mold shop operations be removed from the permit. Alternatively, the media of which "P" is composed needs to be defined for each process.

Response #46

The reference to the Robertson ventilator has been removed from the permit. Condition D.10.3 was placed in the permit at the request of the source. The cardboard baler, the mold swabbing operation, the hot end treatment process, and the mold shop operations are considered insignificant activities and are listed as such in Section A.3 of the permit. However, even though these units are insignificant, they still have applicable requirements, which must be listed in the permit. "P" is defined in the permit as the "process weight rate in tons per hour." The definition of "process weight rate" given in 326 IAC 1-2-59 is "The total weight of all materials introduced into any source operation..." The process weight rate should be the process weight rate of the material from which the emissions originate. The process weight rate is variable, thus, a constant limit is not computed and is not specified in the permit. These insignificant activities, however, can show compliance for a given hour by measuring the process weight rate for that hour. The 326 IAC 6-3-2 limit is an hourly emission limit.

Comment #47

How must the facility record visible emissions notations? Must these deviations be reported, and if so, using which form?

Response #47

Records must be kept of the results of visible emission notations. The records should state whether emissions from each stack were "normal" or "abnormal" each day of operation. When the equipment is not operating, the record should show that visible emission notations were not performed because the equipment was not in operation during that day. Records of these notations shall be kept pursuant to the requirements in Section C - General Record Keeping Requirements. A form for documenting the results of visible emission notations has not been included with the permit. The Permittee can use their own format for documenting the results of the visible emission notations. The source does not need to send in the entire record of all visible emissions notations. However, any deviations, corrective actions, and response steps shall be reported on the Quarterly Compliance Monitoring Report Form.

Company Name: Anchor Glass Container Corporation
Address City IN Zip: 603 East North Street, Winchester, Indiana 47394
T: 135-6042
Plt ID: 135-00012
Reviewer: Nisha Sizemore

boilers installed in 1908, 1940, and 1948
Limit pursuant to 326 IAC 6-2-3

$$Pt = (C \times a \times h) / (76.5 \times (Q^{0.75}) \times (N^{0.25}))$$

C = 50 micrograms per cubic meter
Q = 44.1 total heat input capacity (MMBtu/hr)
N = 3 number of stacks
a = 0.67 plume rise factor
h = 72.67 ft --- stack height

Pt = 1.41 lb/MMBtu heat input
therefore, pursuant to 326 IAC 6-2-3 (d), the limit defaults to 0.8 MMBtu/hr of heat input

$$0.8 \text{ lb/MMBtu} \times 44.1 \text{ MMBtu/hr} = 35.28 \text{ lbs/hr} = 154.53 \text{ tons/yr}$$

Appendix A: Emissions Calculations
#1 and #2 Fuel Oil

Company Name: Ball-Foster Glass Container Company, L.L.C.
Plant Location: East Charles Street, Marion, Indiana
County: Grant
Permit Reviewer: Nisha Sizemore
Title V #: 053-6109-00003

Facility	SO2 Limit (lb/MMBtu)	Capacity (MMBtu/hr)	SO2 Limit (tons/yr)
Boiler 1	0.5	10.5	23.00
Boiler 2	0.5	16.8	36.79
Boiler 3	0.5	16.8	36.79
Boiler 1	1.6	10.5	73.58
Boiler 2	1.6	16.8	117.73
Boiler 3	1.6	16.8	117.73

Boiler #1**Appendix A: Emissions Calculations****Natural Gas Combustion Only****10 < MM BTU/HR <100****Small Industrial Boiler**

Company Name: Anchor Glass Container Corporation
Address City IN Zip: 603 East North Street, Winchester, Indiana 47394
T: 135-6042
Plt ID: 135-00012
Reviewer: Nisha Sizemore

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.5

92.0

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	14.0	14.0	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.6	0.6	0.0	6.4	0.1	1.6

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, as amended 10/96, and 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Boiler #2**Appendix A: Emissions Calculations****Natural Gas Combustion Only****10 < MM BTU/HR <100****Small Industrial Boiler**

Company Name: Anchor Glass Container Corporation
Address City IN Zip: 603 East North Street, Winchester, Indiana 47394
T: 135-6042
Plt ID: 135-00012
Reviewer: Nisha Sizemore

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

16.8

147.2

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	14.0	14.0	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.0	1.0	0.0	10.3	0.2	2.6

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, as amended 10/96, and 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Boiler #3**Appendix A: Emissions Calculations****Natural Gas Combustion Only****10 < MM BTU/HR <100****Small Industrial Boiler**

Company Name: Anchor Glass Container Corporation
Address City IN Zip: 603 East North Street, Winchester, Indiana 47394
T: 135-6042
Plt ID: 135-00012
Reviewer: Nisha Sizemore

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

16.8

147.2

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	14.0	14.0	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.0	1.0	0.0	10.3	0.2	2.6

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, as amended 10/96, and 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Boiler 1**Appendix A: Emissions Calculations
Industrial Boilers
#1 and #2 Fuel Oil**

Company Name: Anchor Glass Container Corporation
Plant Location: 603 East North Street, Winchester, Indiana
County: Randolph
Permit Reviewer: Nisha Sizemore
Title V #: 135-6042-00012

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur
0.49

10.5

657

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	2.0	69.58 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	0.657	22.857	6.570	0.066	1.643
Potential Emission in lbs/MMBtu	0.014	0.497			

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Boiler 2**Appendix A: Emissions Calculations
Industrial Boilers
#1 and #2 Fuel Oil**

Company Name: Anchor Glass Container Corporation
Plant Location: 603 East North Street, Winchester, Indiana
County: Randolph
Permit Reviewer: Nisha Sizemore
Title V #: 135-6042-00012

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur

0.49

16.8

1051.2

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	2.0	69.58 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	1.051	36.571	10.512	0.105	2.628
Potential Emission in lbs/MMBtu	0.014	0.497			

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Boiler 3**Appendix A: Emissions Calculations
Industrial Boilers
#1 and #2 Fuel Oil**

Company Name: Anchor Glass Container Corporation
Plant Location: 603 East North Street, Winchester, Indiana
County: Randolph
Permit Reviewer: Nisha Sizemore
Title V #: 135-6042-00012

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur

0.49

16.8

1051.2

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	2.0	69.58 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	1.051	36.571	10.512	0.105	2.628
Potential Emission in lbs/MMBtu	0.014	0.497			

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Boiler 1

Appendix A: Emission Calculations
Industrial Boilers
#5 and #6 Fuel Oil

Company Name: Anchor Glass Container Corporation
Plant Location: 603 East North Street, Winchester, Indiana
County: Randolph
Permit Reviewer: Nisha Sizemore
Title V #: 135-6042-00012

Heat Input Capacity
MMBtu/hr

10.50

Potential Throughput
kgals/year

661.726619

S = Weight % Sulfur

1.4

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	16 <i>*see below</i>	219.8 (157S)	55.0	0.28	5.0
Potential Emission in tons/yr	5.3	72.7	18.2	0.1	1.7
Potential Emission in lbs/MMBtu	0.1	1.6			

***Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal**

***Particulate Matter emission factor for #6 fuel oil 9.19(s) + 3.22 lb/kgal**

Methodology

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors are from AP42 Tables 1.3-2 and 1.3-4 (SCC 1-02-004-01/02/03 and 1-02-004-04)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

Boiler 2**Appendix A: Emission Calculations
Industrial Boilers
#5 and #6 Fuel Oil**

Company Name: Anchor Glass Container Corporation
Plant Location: 603 East North Street, Winchester, Indiana
County: Randolph
Permit Reviewer: Nisha Sizemore
Title V #: 135-6042-00012

Heat Input Capacity
MMBtu/hr

16.80

Potential Throughput
kgals/year

1058.76259

S = Weight % Sulfur

1.4

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	16 <i>*see below</i>	219.8 (157S)	55.0	0.28	5.0
Potential Emission in tons/yr	8.5	116.4	29.1	0.1	2.6
Potential Emission in lbs/MMBtu	0.1	1.6			

***Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal**

***Particulate Matter emission factor for #6 fuel oil 9.19(s) + 3.22 lb/kgal**

Methodology

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors are from AP42 Tables 1.3-2 and 1.3-4 (SCC 1-02-004-01/02/03 and 1-02-004-04)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

Boiler 3

Appendix A: Emission Calculations
Industrial Boilers
#5 and #6 Fuel Oil

Company Name: Anchor Glass Container Corporation
Plant Location: 603 East North Street, Winchester, Indiana
County: Randolph
Permit Reviewer: Nisha Sizemore
Title V #: 135-6042-00012

Heat Input Capacity
MMBtu/hr

16.80

Potential Throughput
kgals/year

1058.76259

S = Weight % Sulfur

1.4

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	16 <i>*see below</i>	219.8 (157S)	55.0	0.28	5.0
Potential Emission in tons/yr	8.5	116.4	29.1	0.1	2.6
Potential Emission in lbs/MMBtu	0.1	1.6			

***Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal**

***Particulate Matter emission factor for #6 fuel oil 9.19(s) + 3.22 lb/kgal**

Methodology

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors are from AP42 Tables 1.3-2 and 1.3-4 (SCC 1-02-004-01/02/03 and 1-02-004-04)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

Furnaces 1-2**Appendix A: Emissions Calculations
Industrial Boilers
#1 and #2 Fuel Oil**

Company Name: Ball-Foster Glass Container Company, L.L.C.
Plant Location: East Charles Street, Marion, Indiana
County: Grant
Permit Reviewer: Nisha Sizemore
Title V #: 053-6109-00003

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur

0.49

195

12201.4286

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	2.0	69.58 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	12.201	424.488	122.014	1.220	30.504
Potential Emission in lbs/MMBtu	0.014	0.497			

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

boilers 1-3

Appendix A: HAPs Emissions Calculations
Commercial/Institutional/Residential Combustors
#5 and #6 Fuel Oil

Company Name: Anchor Glass Container Corporation
Address City IN Zip: 603 East North Street, Winchester, Indiana 47394
T: 135-6042
Plt ID: 135-00012
Reviewer: Nisha Sizemore

Heat Input Capacity
MMBtu/hr

44.10

Emission Factor in lb/10 ¹² Btu	Pollutant										
	Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
	46.00	114.00	4.20	211.00	128.00	121.00	194.00	74.00	32.00	2330.00	38.00
Potential Emission in tons/yr	0.009	0.022	0.001	0.041	0.025	0.023	0.037	0.014	0.006	0.450	0.007

Total HAPs: 0.64

Methodology

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MMBtu

Emission Factors are from AP 42 Table 1.3-11

Emission (tons/yr) = Throughput (MMBtu/hr) x Emission Factor (lb/10¹² Btu) / 1,000,000 (Btu/MMBtu) x 8760 (hrs/yr) / 2,000 (lb/ton)

Potential Emissions

Appendix A: Emission Calculations

Company Name: Anchor Glass Container Corporation
 Address City IN Zip: 603 Each North Street, Winchester, Indiana 47394
 T: 135-6042
 Plt ID: 135-00012
 Reviewer: Nisha Sizemore

* * Process Emissions * *

Process:	Rate (tons glass/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Regenerative glass melting furnace #1 Capacity: 344 tons/day	14.33	PM	1.40	87.87	87.87	none	
		PM-10	1.32	82.85	82.85		
		SO2	3.40	213.40	213.40		
		NOx	6.20	389.15	389.15		
SCC# 3-05-014-02		VOC	0.20	12.55	12.55		
AP-42 Ch. 11.15		CO	0.20	12.55	12.55		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 16.875 tons/hr

limit = $4.1 \times (16.875)^{0.67}$ = 27.23 lb/hr (allowable)

with potential:

31.8 tons/yr x 2000 lb/ton / 8760.00 hr/yr = 7.30 lb/hr (will comply)

Appendix A: Emission Calculations

Company Name: Anchor Glass Container Corporation
Address City IN Zip: 603 East North Street, Winchester, Indiana 47394
T: 135-6042
Plt ID: 135-00012
Reviewer: Nisha Sizemore

Potential Emissions (tons/yr)

	PM	PM10	VOC	SO2	NOx	CO
Glass Melting Furnace #1	87.89	82.87	12.56	213.45	389.24	12.56
Glass Melting Furnace #2	67.62	61.21	14.24	96.09	142.35	14.24
Batch Handling	1.28	1.28	0.00	0.00	0.00	0.00
Boiler 1	5.30	5.30	0.10	72.70	18.20	1.64
Boiler 2	8.50	8.50	0.20	116.40	29.10	2.63
Boiler 3	8.50	8.50	0.20	116.40	29.10	2.63
Totals	179.09	167.66	27.30	615.04	607.99	33.70

Allowable Emissions (tons/yr)

	PM	PM10	VOC	SO2	NOx	CO
Glass Melting Furnace #1	87.89	82.87	12.56	213.45	389.24	12.56
Glass Melting Furnace #2	83.48	83.48	14.24	363.58	509.83	14.24
Batch Handling	1.28	1.28	0.00	0.00	0.00	0.00
Boiler 1	5.30	5.30	0.10	72.70	18.20	1.64
Boiler 2	8.50	8.50	0.20	116.40	29.10	2.63
Boiler 3	8.50	8.50	0.20	116.40	29.10	2.63
Totals	194.95	189.93	27.30	882.53	975.47	33.70

Notes:

The PM emissions from furnace #1 and batch handling operations are limited by 326 IAC 6-3-2 (Process Operations).

The PM emissions from the boilers are limited by 326 IAC 6-2-3 (Particulate Matter Emissions Limitations for Sources of Indirect Heating).

The SO2 emissions from the boilers are limited by 326 IAC 7-1 (Sulfur Dioxide Emission Limitations).

The PM, SO2, and NOx emissions from furnace #2 are limited by 326 IAC 2-2 (Prevention of Significant Deterioration).

Anchor Glass Container Corporation
603 Each North Street, Winchester, Indiana 47394

T 135-6042
Plt ID 135-00012

Process:	Rate (tons glass/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Regenerative glass	16.25	PM	1.00	71.18	71.18	none	
melting furnace #2		PM-10	1.00	71.18	71.18		
Capacity: 344 tons/day		SO2	1.35	96.09	96.09		
		NOx	2.00	142.35	142.35		
		VOC	0.20	14.24	14.24		
		CO	0.20	14.24	14.24		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P=	19.125	tons/hr					
limit =	$4.1 \times ($	19.125	$^{0.67})$	=	29.61	lb/hr	(allowable)
with potential:							
31.8 tons/yr x	2000	lb/ton /	8760.00	hr/yr =	7.30	lb/hr	(will comply)

Anchor Glass Container Corporation
603 Each North Street, Winchester, Indiana 47394

T 135-6042
Plt ID 135-00012

Process:	Rate (tons material/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Batch Handling	50.00	PM	0.3170	69.42	69.42	baghouse	
		PM-10	0.3170	69.42	69.42		
AP-42 4th Edition Table 8.19.1-1		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

P= 50.00 tons/hr

limit = $55 \times (50.00^{0.11}) - 40 = 44.6 \text{ lb/hr}$ (allowable)

with potential:

$69.4 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 15.9 \text{ lb/hr}$ (will comply)

Anchor Glass Container Corporation
603 Each North Street, Winchester, Indiana 47394

T 135-6042
Plt ID 135-00012

Process:	Rate (tons material/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Glass Furnace Day Bin #1	22.92	PM	0.3170	31.82	31.82	baghouse	
		PM-10	0.3170	31.82	31.82		
AP-42 4th Edition		SO2	0.00	0.00	0.00		
Table 8.19.1-1		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

$$P = 22.92 \text{ tons/hr}$$

$$\text{limit} = 4.1 \times (22.92^{0.67}) = 33.4 \text{ lb/hr} \quad (\text{allowable})$$

with potential:

$$31.8 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 7.3 \text{ lb/hr} \quad (\text{will comply})$$

Anchor Glass Container Corporation
603 Each North Street, Winchester, Indiana 47394

T 135-6042
Plt ID 135-00012

Process:	Rate (tons material/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Glass Furnace Day Bin #2	27.08	PM	0.3170	37.60	37.60	baghouse	
		PM-10	0.3170	37.60	37.60		
AP-42 4th Edition		SO2	0.00	0.00	0.00		
Table 8.19.1-1		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

$$P = 27.08 \text{ tons/hr}$$

$$\text{limit} = 4.1 \times (27.08^{0.67}) = 37.4 \text{ lb/hr} \quad (\text{allowable})$$

with potential:

$$37.6 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 8.6 \text{ lb/hr} \quad (\text{will comply})$$

Ef = Emission factor

Ebc = Potential Emissions before controls = Rate (units/hr) x Ef(lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

Eac = Potential Emissions after controls = (1-efficiency/100) x Ebc

1 lb = 2000 tons